## POUL MARTIN HERTEL

1217 Michigan Court Alexandria Virginia 22314

## STATE AIR POLLUTION CONTROL BOARD

**JANUARY 25, 2008** 

When we started this, a long, very long time ago, the narrative of the plant and DEQ said that the ventury blew the pollutants way up in the air, where the wind blew them way, way out, and that what we had in our neighborhood was "just common dirt". Only when faced with irrefutable scientific evidence did the DEQ cry uncle. The director of air quality enforcement relayed that they knew, they knew there was downwash, but choose not to study it. Instead, you waited until citizens managed to provide irrefutable evidence of its existence.

The permit does not meet National Ambient Air Quality Standards for PM2.5 or mercury

This is actually quite simple; the AERMOD model shows the maximum levels of PM2.5 that can be sustained without breaching the NAAQS. Combined with continuous emission monitoring system, these levels, would provide the protection envisioned by the environmental laws as opposed to the ones of the jungle that the DEQ is proposing.

Currently the limiting factor is the 3818 limit. Without, which the plant will be able to be back were we started 8 years ago, effectively disregarding all the scientific knowledge accumulated these many years. Lest not fool ourselves, Mirant has challenged the 3818 in court, and possible trading provisions are being contemplated by the Legislature. Either of which will enable this plant to bring back the good old days of 2000. I do not believe the legislature deliberately wants to harm us, but the fact is that the DEQ permit, as drawn up, does not provide stringent enough emission limits that are essential for the protection of our health let alone meet the NAAQS.

If this trona is so effective, why do we repeatedly smell Sulphur when we go outside. Along those lines, why did you allow the plant to use data from only one boiler to change the model? The only boiler that did not experience a significant increase in the opacity levels with trona injections. Higher opacity is not a good thing, to be frank, the higher opacity combined with frequent Sulphur smell suggest that you do not have a handle on the situation. Mr. Paylor I am not going to belabor, our plight, but living in Nethergate and smelling Sulphur is exactly what you are putting us through along with every other person living or moving into the surrounding neighborhood. My wife now spends up to 3 days a month at the hospital because of the DEQ.

There are ways to deal with this. We have supported the Cities contention that baghouse technology is a minimum requirement for continued operations in a manner that ensures the plant meets the National Ambient Air Quality Standards. The plant should have undergone a new source review and forced to implement these changes. Furthermore, other states have implemented efforts to control PM2.5, why not Virginia? The City of Alexandria has solutions, why not follow them? Other states have.

Why are we worth so much less than other people?

Our health cannot be left to people who have historically chosen to ignore the science, the laws and inevitably our health for the sake of keeping this plant operating at maximum capacity. So many days when we step outside, the smell of sulfur dioxide reminds us of the health risks that the DEQ is asking us to bear.